



DEPARTMENT OF THE AIR FORCE
HEADQUARTERS AIR FORCE MATERIEL COMMAND
WRIGHT-PATTERSON AIR FORCE BASE OHIO

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27 DEC 1994

MEMORANDUM FOR SEE DISTRIBUTION

FROM: HQ AFMC/PK
4375 Chidlaw Road, Suite 6
Wright-Patterson AFB OH 45433-5006

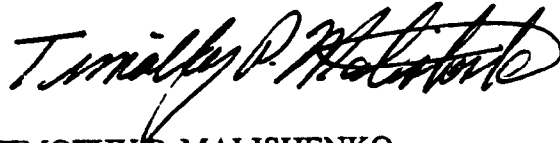
SUBJECT: Hazardous Materials Management Commander Directed Inspection (HMM CDI)

1. During the months of July 1994 through September 1994, a follow-up HMM CDI was conducted on the implementation of the "pharmacy concept" at the Air Logistics Centers (ALCs). The initial inspection of the ALCs was conducted in July 1993 and August 1993. The follow-up HMM CDI for non-ALCs is being conducted between November 1994 and February 1995.
2. The report, AFMC PN 94-27, indicated the ALCs are continuing to implement the "pharmacy concept" as directed; however, the implementation varies from base to base. Those that are not making significant progress will be or have been reinspected.
3. The report identified three deviations from the essential elements that require resolution for the effective implementation of the "pharmacy concept" across AFMC. It also indicated five areas to review which could enhance the management and control of hazardous material (HM). None of these eight items had PK, either at the headquarters or field level, as an OPR. However, two of the items are contracting related issues and we need your assistance to ensure that they are worked in a timely manner.
4. The first item is the need to improve the identification and tracking of all nonstandard material entering the installation. This includes material used by contractors in the performance of their contracts onbase. As a result of the initial inspection at the ALCs and non-ALCs, PKO letter, dated 22 April 1994, advised of the need to include AFOSH Standard 161-21 in contracts where the contractor could bring HM on the installation in support of their contract. This standard requires the contractor to submit information on the use of HM in accordance with FAR 52.223-3, Hazardous Material Identification and Material Safety Data. This matter was discussed with contracting personnel during the initial Inspector General inspection and a copy of the standard was left with your operational contracting personnel. Please ensure this standard is being included in your contracts, when appropriate.

Atch 95-2C (FAR 23) Post to FAR 23.3, DFARS 23.3 and AFFARS 23.3 by circling the reference and noting in the margins: "70-41, atch 95-2C." Then file this atch behind the sups to FAR 23.

5. The second item is the need to review and possibly change applicable regulatory guidance in order to accommodate the objectives of effective HM management. One of the regulations frequently mentioned was the Federal Acquisition Regulation (FAR). If your functional counterparts believe changes to the FAR are needed, please work with them to accomplish this, whenever possible. A FAR case, prepared in accordance with DFARS 201.201-1, will be needed in that situation.

6. If you have any questions, please call me or have your staff call my action officer, Mr. C. Wayne Loyd, HQ AFMC/PKO, DSN 787-3367.



TIMOTHY P. MALISHENKO
Brigadier General, USAF
Director of Contracting